

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA, *
Plaintiff, *
*
v. * CRIMINAL NO. 99-273 (JAF)
*
MANUEL DURAN PIMENTEL, *
Defendant. *
*

**MOTION FOR EARLY TERMINATION
OF SUPERVISED RELEASE TERM**

TO THE HONORABLE JOSE A FUSTE,
CHIEF JUDGE OF THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO.

The defendant MANUEL DURAN PIMENTEL, by and through her undersigned counsel, respectfully requests, states and prays as follows:

1. Defendant Manuel Duran Pimentel was sentenced to serve 97 months of imprisonment and five years of supervised release on November 8, 2000.
2. When released from confinement, Mr. Duran served 6 months at the Community Correction Center in Tampa, Florida. Mr. Duran completed the program successfully.

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3. On January 27, 2006, Mr. Duran was released to commence his supervised release term. To this date, Mr. Duran has complied with all conditions imposed. We recount the history of his supervision in support of our request:

- a. Duran is released under supervision at Tampa, Florida. He started working with D&C Floors.
 - b. Takes a three month course in air conditioning repair and starts working with Toro Air Conditioning and Holiday Air Conditioning.
 - c. After almost two years, becomes unemployed towards September of 2007. Attempts to secure employment for three months and moves to Puerto Rico by the end of 2007.
 - d. After moving to Puerto Rico Mr. Duran secured employment with Mayendia Holding Construction, in construction work until April of 2008.
 - e. On April of 2008 Mr. Duran secures employment with Adriano Iron Works until today. (See attached letter)
4. Mr. Duran has filed all his tax returns. (Attached)
5. Pursuant to 18 U.S.C. § 3583(e)(1) the court may “terminate a term of supervised release and discharge the defendant released at any time after the

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expiration of one year of supervised release, pursuant to the provisions of the Federal Rules of Criminal Procedure relating to the modification of probation, if it is satisfied that such action is warranted by the conduct of the defendant released and the interest of justice."

6. Mr. Duran Pimentel lives at 368 Calle Palacios, Villa Palmeras, Santurce, P.R. with his wife and child.

7. Mr. Duran Pimentel has displayed exceptional conduct that reflects on his effort to rehabilitate and re integrate as a law abiding member of society.

8. Granting Mr. Duran's petition to terminate his supervised release will allow him to seek better employment opportunity and freedom to lead a normal life.

WHEREFORE it is respectfully requested that this Honorable Court terminate the term of supervised release imposed on Manuel Duran Pimentel.

In San Juan, Puerto Rico, this 19th day of September, 2008.

s/Laura Maldonado Rodriguez
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CERTIFICATE OF SERVICE

On September 19, 2008, copy of this MOTION was filed through the electronic filing system. Counsel certifies the United States Attorney for the District of Puerto Rico, H.S. Garcia with office at Torre Chardon, Suite 1201, 350 Carlos Chardon Ave., Hato Rey, Puerto Rico, 00918, is the attorney designated to receive copy of all filings in the case.

In San Juan, Puerto Rico, this 19th day of September, 2008.

s/Laura Maldonado Rodriguez
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